I.   Statement of Substance of Interview

As a preliminary matter, the undersigned thanks the Examiner for the courtesy of the
personal interview conducted on January 3, 2006. During the interview, the patentability of
independent claims 1, 8 and 15 was discussed. In particular, Applicant's representative argued
that the cited prior art references, alone or in combination, fail to disclose dynamically detecting
availability of the data source in response to a subsequent request for the data source and re-
connecting the data source to the remote application in response to the subsequent request as
recited in independent claims 1, 8 and 15. The Examiner agreed with Applicant's position with
respect to the Mastors combination and agreed to reconsider the arguments regarding that
rejection filed in the September 6, 2006 Amendment. With regard to the Guenther combination,
the Examiner disagreed with Applicant's position and maintained that the reference discloses the
aforementioned feature. In view of his position, the Examiner cited a new portion of Guenthner
in support of his rejection. (see column 9, lines 26-35 of Guenthner).

II.   Prior Art Rejections

Claims 1-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Polizzi* in
view of *Guenthner*. Claims 1-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable
over *Polizzi* in view of *Mastors*. Claims 20-22 are rejected under 35 U.S.C. § 103(a) as being
unpatentable over *Polizzi* and *Guenther* in view of *Brendel*. Applicant respectfully submits that
the claimed invention would not have been rendered obvious in view of the combinations of the
cited prior art.

Independent claim 1 is directed to a method for automatically re-establishing a

connection to a data source accessible by a plurality of remote applications. Independent claim 1

recites:

> providing at least one interface module configured to interface with a
> remote application;
> providing at least one port module configured to interface between the
> interface module and the data source;
> providing a connection manager to facilitate the interface between the
> interface module and the port module;
> detecting unavailability of the data source in response to an initial request
> for the data source by the remote application;
> dynamically detecting availability of the data source in response to a
> subsequent request for the data source; and
> re-connecting the data source to the remote application in response to the
> subsequent request.

In the Amendment filed September 7, 2006, Applicant argued that even if *Guenthner*

teaches a browser that detects the failure of a server to reply as asserted by the Examiner,

Guenthner fails to teach or suggest "dynamically detecting availability of the data source in

response to a subsequent request for the data source and re-connecting the data source to the

remote application in response to the subsequent request" as required by claim 1. Rather,

Guenthner is directed to a policy whereby a client retries entries that were marked "Bad" at a

fairly frequent interval at least once an hour. See *Guenthner* column 9, lines 26-35.

In response the Examiner asserts:

> Guenthner further discloses that " it is desirable that clients resume using primary
> servers as soon as possible when the servers are restored to service." (column 9,
> lines 26-28 of Guenthner). This implication of this statement is that the clients
> will detect when primary servers have become available in order to resume using
> the primary servers. The purpose of the policy is to enable the clients access to
> servers …[b]ased on the purposes of the policy, it would seem obvious to one of

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ordinary skill ... [t]herefore ... the feature of dynamically detecting availability of a data source in response to a subsequent request and re-connecting the data source to the remote application is obvious in view of Guenthner. (See page 3 of the Office Action).

Applicant respectfully disagrees with the Examiner's position. Column 9, lines 25-35 of Guenthner states: "[h]owever, especially with a primary/backup list, it is desirable that clients resume using primary servers as soon as possible ...[t]herefore, the invention enforces a policy whereby a client retries entries that were marked "Bad" at a fairly frequent interval. However, Guenthner does not teach or suggest <u>dynamically detecting</u> availability of the data source <u>in response to a subsequent request for the data source</u>; and <u>re-connecting the data source</u> to the remote application <u>in response to the subsequent request</u>, as required by claim 1. (<u>emphasis added</u>). Instead, Guenthner merely discloses that the upon the enforcement of a policy, a client retries entries that were marked defective, not in response to a subsequent request for the data source as asserted by the Examiner in the interview conducted on January 3, 2006.

Similarly, Mastors does not teach or suggest these features of the claimed invention which are missing from Guenthner.

Further, based on the interview with the Examiner conducted on January 3, 2006, where the Examiner agreed to reconsider arguments with respect to Mastors filed in the September 7, 2006 Amendment, Applicant resubmits that even if *Mastors* teaches a client that writes data to a file at the client and creates an optimized log file of the disconnected writes as asserted by the Examiner, *Mastors* fails to teach or suggest "dynamically detecting availability of the data source in response to a subsequent request for the data source and re-connecting the data source to the

remote application in response to the subsequent request" as required by claim 1. Rather,

Mastors is directed to a copy-file-to-server routine by looking up an operation in the CRED table

based on a file. See *Mastors* column 7, lines 5-10. Further, *Mastors* never mentions or suggests

dynamically detecting the availability of the data source in response to a subsequent request for

the data source.

For at least these reasons it is respectfully submitted that claim 1, and the claims that

depend therefrom, are patentable.

Independent claims 8 and 15 recite similar limitations to those discussed above that are

missing from the prior art. Accordingly, claims 8 and 15, and the claims that depend therefrom,

are patentable for at least the same reasons discussed above. Accordingly, Applicant respectfully

requests that the Examiner withdraw the rejection.

II.   Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

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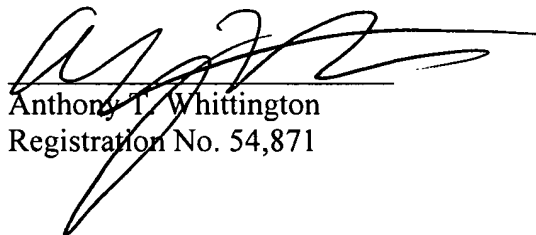
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